

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
v.  
**Julio MARTINEZ-Martinez**

Case No.  
L-25-PO60692

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 28, 2025 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

8 USC 1325(a)(1)

*Offense Description*

an alien, did unlawfully enter and attempt to enter the United States at a place other than designated by immigration officer.

This criminal complaint is based on these facts:

Furthermore, it is based on verbal statements by, Julio MARTINEZ-Martinez, who admitted to being a citizen of Mexico, who entered or attempted to enter illegally into the United States by wading the Rio Grande River near, Laredo, Texas, thus avoiding immigration inspection, nor having proper documents to enter, travel through, or remain in the United States. This illegal entry or attempted entry took place on April 28, 2025.

☐ Continued on the attached sheet.

/s/Luis I. Molina Castro

\_\_\_\_\_  
*Complainant's signature*

Luis I. Molina Castro, Border Patrol Agent

\_\_\_\_\_  
*Printed name and title*

Sworn to before me and signed in my presence  
Submitted by reliable electronic means  
per Fed.R.Crim.P. 4.1, Luis I Molina Castro  
sworn to, signature attested telephonically,  
and probable cause found on May 1, 2025,  
at 8:29 AM, at Laredo, Texas.



Christopher dos Santos  
United States Magistrate Judge